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REMARKS

In response to the Office Action mailed on July 26, 2007, Applicant(s) respectfully request(s) reconsideration. Claim(s) 1-28 and 33-35 are now pending in this Application. Claim(s) 1, 3, 5, 8, 13, 15, 17, 20, 23, 25, 27 and 35 are independent claims and the remaining claims are dependent claims. In this Amendment, claim(s) 1-6, 7, 8, 10, 11 and 13-28 have been amended and claims 33-35 have been added. Applicant(s) believe that the claim(s) as presented are in condition for allowance. A notice to this affect is respectfully requested.

REJECTIONS under 35 U.S.C. § 112

Claims 1-28 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The Applicants have amended claims 1-6, 7, 8, 10, 11 and 13-28 to overcome the rejection. The terms "capable of" and "suitable for" have been removed from the claims.

Withdrawal of the rejections is respectfully requested.

REJECTIONS under 35 U.S.C. § 103

Claims 1-28 stand rejected under 35 U.S.C. § 103(a) as obvious over Ladd, U.S. Patent No. 6,269,336 in view of MacKenty, U.S. Patent No. 6,088,675. The Applicants respectfully disagree and traverse the rejection with an argument. Ladd discusses creating a markup language document with information for interactive services. MacKenty discusses a method of assigning sounds to various types of SGML tags.

On page 4 of the Office Action, it is stated that Ladd col. 11, lines 30-45 teaches "the first executable resource generates text portions from the body of text in response to receiving an initial web request to convert the body of text to speech," as in amended claim 1. Ladd col. 11, lines 30-45 states

In response to voice inputs from the user or DTMF tones, the voice browser 250 generates a content request (i.e., an electronic address) **to navigate to a destination of one or more of the information sources**. The content request can use at least a portion of a URL, a URN, an IP, a page request, or an electronic email.

After the voice browser is connected to an information source, the voice browser preferably **uses a TCP/IP connect to pass requests to the information source**. The information source responds to the requests, sending at least a portion of the requested information, represented in electronic form, to the voice browser. The information can be stored in a database of the information source and can include text content, markup language document or pages, non-text content, dialogs, audio sample data, recognition grammars, etc. [Emphasis added]

Thus, Ladd teaches using an address to get to content of an information source and the information source sends at least a portion of the requested information via a TCP/IP connection. It does not generate text portion from the body of the text. The cited text further does not teach or suggest “the first executable resource provides an output in response to generating the text portions,” as in amended claim 1.

On page 5 of the Office Action, it is admitted that Ladd does not disclose “comprising a sequence of resource identifiers for the text-to-speech conversion of the text portions, each of the resource identifiers comprising a corresponding one of the text portions and an identity of a resource for use in performing the text-to-speech conversion” and “text portion web request comprising the at least one text portion and one of the resource identifiers,” as in amended claim 1. The Office cites MacKenty col. 2, lines 14-24, col. 7, line to col. 9, line 20, col. 1, lines 54-55 and col. 4, lines 64-65. As stated above, MacKenty discusses a method of assigning sounds to tags within an SGML document. MacKenty, col. 2, lines 14-24 summarizes for example, that “application for visually display SGML documents, to present SGML documents to computer users auditorially, instead of visually.” (see Ladd col. 2 lines 10-12) Thus, MacKenty as cited present a web page auditorially. This is not the output of a first executable resource “comprising

a sequence of resource identifiers for the text-to-speech conversion of the text portion.” MacKenty col. 7, line to col. 9, line 20 discusses presenting a web page auditorally, for example at col. 8, lines 26 “causing the sonification engine to produce a sound indicating that the text currently being read aloud is a hotlink to another document, as marked by the <A> tag or Ladd col. 8, lines 40-42 “the <P> tag is encountered and sent to the sonification engine, the engine produces a different non-speech sound.” Thus, as cited MacKenty teaches not the output of a sequence of resource identifiers, but merely reading a web page and producing a sound for the different tags encountered within the page. Further, Ladd col. 9, lines 1-3 states “just after the document begins to be read, they can issue a command which causes the reading to stop and immediately resume just after the <P> tag. Thus, Ladd again just reads SGML, skips ahead on user command, it does not output a sequence of resource identifiers for text-to-speech conversion.”

MacKenty col. 4, lines 61-64 states “[c]haracter data can be split into multiple node of the tree at sequence boundaries, and very long sequences may be further divided into multiple node to avoid having any single node containing a large amount of text.” Thus as discussed, Ladd parses long sequences into nodes, but it does not discuss the output of a sequence of resource identifiers.

For at least the reasons stated above, the combination of Ladd and MacKenty, taken separately or in combination fails to teach or suggest the elements of claims 1, 3, 5, 8, 13, 15, 17 , 20, 23, 25 and 27 and the claims dependent therefrom.

As regards claim 2, on page 6 of the Office Action it is stated that Ladd col. 11, lines 34-35 and col. 3, lines 7-23 teaches “the first executable resource generates the text portions in response to receiving an initial hypertext transport protocol (HTTP) request to convert the body of text to speech; the first executable resource provides a hypertext markup language (HTML) page comprising uniform resource locators (URL’s), wherein each URL comprises a text character string for conversion to the audio format and an HTTP address of

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the resource; and the second executable resource receives at least one HTTP request comprising at least one of the URL's," as in amended claim 2. As discussed above Ladd does not generate text portion, it merely acts as an intermediary connecting between two points.

For at least the reasons stated above, the combination of Ladd and MacKenty, taken separately or in combination fails to teach or suggest the elements of claim 2.

New Claims

Claims 33 -35 are new. Support for claims 33 and 34 found on page 14, lines 6-26 of the Application. Support for claim 35 found in claim 3 as well as Fig. 3 and the supporting text. Applicants respectfully submit that no new matter has been added by claims 33-35. The cited art fails to teach or suggest that the body of the text is divided into a text portions, that a uniform resource locator is produced comprising a name of a resource for converting text-to-speech and the words of a divided text portion separated by delimiters;

Summary

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. It is believe that no new matter has been added. An early action to that effect is courteously solicited.

Applicant(s) hereby petition(s) for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50-3735.

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If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 616-9660, in Westborough, Massachusetts.

Respectfully submitted,



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Attorney Docket No.: CIS00-2413

Dated: October 4, 2007